

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183-MEM

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**JOINT MOTION TO STAY CASE AND ORDER MEDIATION**

NOW COMES, the respective parties, by and through their respective counsel, and in support of this motion, aver as follows:

1. The parties in this matter have agreed to take advantage of the Middle District of Pennsylvania's mediation program.
2. The parties have agreed upon Joseph A. Barrett, Esquire from the Court's Certified Mediators list to serve as mediator in this matter.
3. The parties also agree to a stay of all proceedings in this case pending the outcome of the mediation.

WHEREFORE, the parties respectfully request that this Honorable Court enter an Order staying further proceedings and ordering the parties to mediation with Joseph A. Barrett, Esquire.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire  
Gerard M. Karam, Esquire  
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/s/ Christopher J. Szewczyk, Esquire  
Christopher J. Szewczyk, Esquire  
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Attorneys for the Plaintiff

/s/ A. James Hailstone, Esquire  
A. James Hailstone  
Bar I.D. # PA80055  
Attorney for Defendant

Date: January 9, 2019

**CERTIFICATE OF CONCURRENCE**

The undersigned hereby certifies that on January 9, 2019, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion.

Attorney Hailstone concurs in Plaintiff's request.

/s/ Christopher J. Szewczyk, Esquire  
Christopher J. Szewczyk, Esquire  
Mazzoni, Karam, Petorak, and  
Valvano  
321 Spruce Street  
Suite 201  
Scranton, PA 18503  
(570) 348-0776

Dated: January 9, 2019

**CERTIFICATE OF SERVICE**

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 9th day of January, 2019.

/s/ Gerard M. Karam, Esquire  
Gerard M. Karam, Esquire

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, based upon the Joint Motion to Stay Case and Order Mediation, said motion is GRANTED. It is ORDERED as follows:

1. All case deadlines shall be stayed until the completion of mediation.
2. Joseph A. Barrett, Esquire is hereby appointed as mediator in this matter.

BY THE COURT:

\_\_\_\_\_. J.